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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE NO. 21-31954-HDH-11
	§	
2999TC ACQUISITIONS, LLC,	§	CHAPTER 11
	§	
DEBTOR.	§	
	§	

**HNGH TURTLE CREEK, LLC'S JOINT MOTION FOR LEAVE TO FILE EXHIBIT A
TO AGREED ORDER REGARDING MOTION TO LIFT STAY, MOTION TO
DISMISS, MOTION FOR SANCTIONS, AND MOTION TO ENFORCE STAY UNDER
SEAL**

HNGH Turtle Creek, LLC ("**HN**") and 2999TC Acquisitions, debtor ("**Debtor**") jointly file this *Motion for Leave to File Exhibit A Under Seal* (the "**Motion**") in connection with *Agreed Order Regarding Motion to Lift Stay* [Doc. 10], *Motion to Dismiss* [Doc. 9], *Motion for Sanctions* [Doc. 15] and *Motion to Enforce Stay* [Doc. 14] (the "**Agreed Order**"),¹ under section 107 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and Rule 9077-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the "**Local Rules**") for an order, substantially in the form attached hereto as Exhibit 1 (the "**Order**") (i) authorizing HN and the Debtor to file

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in Agreed Order.

Exhibit A to the Agreed Order under seal, and (ii) granting related relief. In support of this Motion, HN and the Debtor respectfully state as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue of these cases in this District is proper in this district under 28 U.S.C. §§ 1408 and 1409.

FACTS

3. On November 4, 2021, HN filed its *Motion to Dismiss Debtor's Bankruptcy Case or, In the Alternative, for Relief from the Automatic Stay, with Incorporated Brief in Support*, (the "**Motion to Dismiss**") at Docket Nos. 9 and 10.

4. On November 5, 2021, the Debtor filed its *Expedited Motion to Enforce Automatic Stay and for Sanctions Pursuant to 11 U.S.C. Section 362* (the "**Motion for Sanctions**" and with the Motion to Dismiss, the "**Contested Matters**") at Docket Nos. 14 and 15.

5. The Court held a hearing on the Contested Matters on December 9, 2021 at 9:00 a.m.

6. Exhibit A contains information HN and the Debtor assert should be kept confidential, and that confidentiality of Exhibit A is in the best interests of the Debtor's estate. HN and the Debtor agree that Exhibit A should be filed under seal and should remain confidential and provided a synopsis of their reasoning to the Court at the hearing on the Contested Matters.

RELIEF REQUESTED

7. Pursuant to the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, this Court may permit parties to file exhibits under seal even if no statute or rule requires the exhibit to be filed under seal. *See* LBT 9077-1(b). HN and the Debtor

request that the Court grant this Motion in order to preserve the confidentiality of Exhibit A for the benefit of the Debtor's estate.

8. Concurrently with the filing of this Motion, HN and the Debtor will file Exhibit A electronically with Court pursuant to the Local Rules for the Northern District of Texas and the ECF event for sealed documents.

WHEREFORE, HN prays that this Court grant this Motion and allow the Exhibit A to be filed under seal and grant such other and further relief to which it may be justly entitled.

DATED: December 9, 2021

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ John J. Kane
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-and-

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PROPOSED COUNSEL FOR THE DEBTOR

CERTIFICATE OF CONFERENCE

On December 9 2021, I communicated with counsel for the Debtor regarding the requested relief and the Debtor agrees with the relief requested and supports this Motion.

/s/ John J. Kane
John J. Kane

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2021, a true and correct copy of the foregoing document was filed with the Court and served (i) via the Court's electronic case filing system (ECF) upon all parties receiving such electronic service in this proceeding, and (ii) via e-mail on the parties listed below.

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/s/ John J. Kane
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